

COMPOSITE EXHIBIT A

DECLARATION OF CONSENT TO REMOVAL

Pursuant to 28 U.S.C. § 1746, I, Jonathan Mitchell declare as follows:
(Name)

I am the owner/attorney of American Financial Law Group, LLC ("AFLG").
(Title)

As such, I am a duly authorized agent of AFLG and, in accordance with 28 U.S.C. § 1446(b)(2)(A), hereby give consent, on behalf of AFLG, to the removal of the case styled as *State of Mississippi ex rel. Jim Hood, Attorney General of the State of Mississippi v. Global Client Solutions, LLC, et al.*, Cause No. G-18-371 from the Chancery Court of Hinds County, First Judicial District, Mississippi, to the United States District Court for the Southern District of Mississippi.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on this 1 day of May, 2018

Signature: [Signature]
Print Name: Jonathan Mitchell
Title: owner/attorney
On behalf of American Financial Law Group, LLC

DECLARATION OF CONSENT TO REMOVAL

Pursuant to 28 U.S.C. § 1746, I, Kenneth S. Ingber, Esq. declare as follows:
(Name)

I am the counsel of record of Apex Legal Group, PC (“Apex”).
(Title)

As such, I am a duly authorized agent of Apex and, in accordance with 28 U.S.C. § 1446(b)(2)(A), hereby give consent, on behalf of Apex, to the removal of the case styled as *State of Mississippi ex rel. Jim Hood, Attorney General of the State of Mississippi v. Global Client Solutions, LLC, et al.*, Cause No. G-18-371 from the Chancery Court of Hinds County, First Judicial District, Mississippi, to the United States District Court for the Southern District of Mississippi.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on this 30th day of April, 2018

Signature: 

Print Name: Kenneth S. Ingber, Esq.

Title: Partner

On behalf of Apex Legal Group, PC

DECLARATION OF CONSENT TO REMOVAL

Pursuant to 28 U.S.C. § 1746, I, John Liv-Nielsen declare as follows:
(Name)

I am the Manager of Assurance Consumer Services, LLC ("ACS").
(Title)

As such, I am a duly authorized agent of ACS and, in accordance with 28 U.S.C. § 1446(b)(2)(A), hereby give consent, on behalf of ACS, to the removal of the case styled as *State of Mississippi ex rel. Jim Hood, Attorney General of the State of Mississippi v. Global Client Solutions, LLC, et al.*, Cause No. G-18-371 from the Chancery Court of Hinds County, First Judicial District, Mississippi, to the United States District Court for the Southern District of Mississippi.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on this 30 day of April, 2018

Signature: [Signature]
Print Name: John Liv-Nielsen
Title: Manager
On behalf of Assurance Consumer Services, LLC



DECLARATION OF CONSENT TO REMOVAL

Pursuant to 28 U.S.C. § 1746, I, Jenssen Varela declare as follows:
(Name)

I am the managing member of Consumer Capital Advocates, LLC ("CCA").
(Title)

As such, I am a duly authorized agent of CCA and, in accordance with 28 U.S.C. § 1446(b)(2)(A), hereby give consent, on behalf of CCA, to the removal of the case styled as *State of Mississippi ex rel. Jim Hood, Attorney General of the State of Mississippi v. Global Client Solutions, LLC, et al.*, Cause No. G-18-371 from the Chancery Court of Hinds County, First Judicial District, Mississippi, to the United States District Court for the Southern District of Mississippi.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on this 30 day of April, 2018

Signature: 

Print Name: Jenssen Varela

Title: managing member

On behalf of Consumer Capital Advocates, LLC

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI
NORTHERN DIVISION**

**STATE OF MISSISSIPPI *ex rel.* JIM HOOD,
Attorney General of the State of Mississippi**

PLAINTIFF

VS.

CIVIL ACTION NO. _____

**GLOBAL CLIENT SOLUTIONS, LLC, GLOBAL HOLDINGS, LLC,
US LEGAL SERVICES GROUP, P.C., APEX LEGAL GROUP, P.C.,
AMERICAN FINANCIAL LAW GROUP, LLC, MOORE LEGAL
CENTER, P.C., THE LAW OFFICES OF ROBERT S. GETMEID
& ASSOC., PLLC, ROBERT S. GITMEID, TIMBERLINE FINANCIAL, LLC,
GRT FINANCIAL, INC., CONSUMER CAPITAL ADVOCATES, LLC,
ASSURANCE CONSUMER SERVICES, LLC**

DEFENDANTS

**CONSENT AND JOINDER IN NOTICE OF REMOVAL
BY TIMBERLINE FINANCIAL, LLC**

COMES NOW the Separate Defendant, TIMBERLINE FINANCIAL, LLC (“Timberline”), and files this, its *Consent and Joinder in Notice of Removal*, and in support thereof, would show unto the Court the following, to-wit:


The undersigned H. Hunter Twiford III and Stephen T. Masley, McGlinchey Stafford, PLLC, are the attorneys of record for Timberline in the case styled *State of Mississippi ex rel. Jim Hood, Attorney General of the State of Mississippi v. Global Client Solutions, LLC, et al.* Case No. 25CH1:18-cv-00371-PDW, initially filed in the Chancery Court of Hinds County, First Judicial District, Mississippi. In accordance with 28 U.S.C § 1446(b)(2)(A), Timberline hereby gives its consent to the removal of said case to the United States District Court for the Southern District of Mississippi, and joins the Notice of Removal filed by Global Client Solutions, LLC and Global Holdings, LLC. The undersigned counsel of record for Timberline are formally acting on behalf of Timberline by executing this consent, and have the specific authority from Timberline to do so. *See Getty Oil Corp. v. Insurance Company of North*

America, 841 F.2d 1254, 1262 (n. 11)(5th Cir. 1988); *Chapman v. RevClaims, LLC*, 2018 WL 893866 at *2-4 (S.D. Miss. February 14, 2018); *Mendoza v. Hicks*, 2015 WL 13532727 at *1-2 (E.D. La. June 17, 2015).

THIS, the 2nd day of May, 2018.

Respectfully submitted,

TIMBERLINE FINANCIAL, LLC

By: 
H. HUNTER TWIFORD III
One of its Attorneys

OF COUNSEL:

H. Hunter Twiford III (MSB No. 8162)
Stephen T. Masley (MSB No. 101870)
MCGLINCHEY STAFFORD, PLLC
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Email: htwiford@mcglinchey.com; smasley@mcglinchey.com

DECLARATION OF CONSENT TO REMOVAL


Pursuant to 28 U.S.C. § 1746, I, Shawn Burdick, declare as follows:

I am the President of GRT Financial, Inc. ("GRT").

As such, I am a duly authorized agent of GRT and, in accordance with 28 U.S.C. § 1446(b)(2)(A), hereby give consent, on behalf of GRT, to the removal of the case styled as *State of Mississippi ex rel. Jim Hood, Attorney General of the State of Mississippi v. Global Client Solutions, LLC, et al.*, Cause No. G-18-371 from the Chancery Court of Hinds County, First Judicial District, Mississippi, to the United States District Court for the Southern District of Mississippi.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on this 1st day of May, 2018

Signature: 
Print Name: Shawn Burdick
Title: President
On behalf of GRT Financial, Inc.

DECLARATION OF CONSENT TO REMOVAL

Pursuant to 28 U.S.C. § 1746, I, Thomas A. Moore, declare as follows:

I am the sole shareholder and owner of Moore Legal Center, PC (“MLC”).

As such, I am a duly authorized agent of MLC and, in accordance with 28 U.S.C. § 1446(b)(2)(A), hereby give consent, on behalf of MLC, to the removal of the case styled as *State of Mississippi ex rel. Jim Hood, Attorney General of the State of Mississippi v. Global Client Solutions, LLC, et al.*, Cause No. G-18-371 from the Chancery Court of Hinds County, First Judicial District, Mississippi, to the United States District Court for the Southern District of Mississippi.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on this 30th day of April, 2018



Signature:

Print Name: Thomas A. Moore

Title: Owner

On behalf of Moore Legal Center, PC

DECLARATION OF CONSENT TO REMOVAL

Pursuant to 28 U.S.C. § 1746, I, Kenneth S. Ingber, Esq. declare as follows:
(Name)

I am the attorney of record of US Legal Services Group PC ("USLG").
(Title)

As such, I am a duly authorized agent of USLG and, in accordance with 28 U.S.C. § 1446(b)(2)(A), hereby give consent, on behalf of USLG, to the removal of the case styled as *State of Mississippi ex rel. Jim Hood, Attorney General of the State of Mississippi v. Global Client Solutions, LLC, et al.*, Cause No. G-18-371 from the Chancery Court of Hinds County, First Judicial District, Mississippi, to the United States District Court for the Southern District of Mississippi.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on this 30th day of April, 2018

Signature: 

Print Name: Kenneth S. Ingber, Esq.

Title: Partner

On behalf of US Legal Services Group PC

From: Stone, Adam <astone@joneswalker.com>
Sent: Tuesday, May 01, 2018 1:33 PM
To: Meredith Leonard
Cc: Pickett, Kaytie; Madrak, Elizabeth; Murphy, Stacey
Subject: MS v. Global et al - Removal and consent

Meredith,

My clients Robert S. Gitmeid and The Law Offices of Robert S. Gitmeid & Assoc., PLLC consent to removal of this case by Global. We will also file a Notice of Consent immediately following your filing of the Notice of Removal. Please let me know if you need anything else.

adam